3.3 WATER RESOURCES

The following information has been updated in the Final EIS. These updates and clarifications to both the text and figures do not change the conclusions presented in the Draft EIS.

3.3.1 Existing Conditions

- The scale in Figure 3.3-4 has been revised. The new Figure 3.3-4, located at the end of this section, should replace the one in the Draft EIS.

3.3.2 Impacts of the Proposed Action

- After the last paragraph on Page 3.3-14 of the Draft EIS, the following text should be added.

> As originally proposed in the ASC, a perimeter ditch was to be constructed around the entire site to intercept surface water coming onto the site from the south and east. Because of concerns about the potential of this ditch draining Wetland C, the Corps has indicated the ditch will not be permitted in that portion of the site.

- Figure 3.3-8 has been revised to show the updated layout or location of detention pond 1 and the cooling tower within the fenceline of the cogeneration facility. Figure 3.3-8, located at the end of this section, should replace the one in the Draft EIS.

- In the second full paragraph on Page 3.3-21 of the Draft EIS, the sixth sentence should be replaced with the following:

> To the extent possible, construction of the storm drainage facilities for the laydown areas would occur when the ground is dry enough to work efficiently.

- In the fourth paragraph on Page 3.3-22 of the Draft EIS, the third sentence should be replaced with the following:

> To the extent possible, construction of the water reuse facilities would occur when the ground is dry enough to work efficiently.

- The last sentence in the second paragraph on Page 3.3-23 should be deleted and replaced with the following text.

> As originally proposed in the ASC, a perimeter ditch was to be constructed around the entire site to intercept surface water coming onto the site from the south and east. Because of concerns about the potential of this ditch draining Wetland C, the Corps has indicated the ditch will not be permitted in that portion of the site.

- On Page 3.3-23 of the Draft EIS, the following sentence should be added at the end the third paragraph.

The loss of 30.51 acres of wetland would result in the loss of the associated stormwater storage functions.

- Changes to the following text have been added for clarification. The average amount of reuse water available from an operational Alcoa Intalco Works has been changed from 2,770 gpm to 2,780 gpm. Also, the maximum instantaneous use of the cogeneration facility could exceed 2,801 gpm. As a result, the fifth paragraph on Page 3.3-23 of the Draft EIS should be deleted and replaced with the following text.

Industrial process water would be supplied through a water re-use agreement between the Whatcom County PUD, the Applicant, and Alcoa Intalco Works for once-through cooling water from Alcoa, assuming Alcoa Intalco is in operation. Under this scenario, Alcoa would be able to provide approximately 2,780 gpm and the excess not used by the cogeneration facility could be used by the refinery, resulting in a net reduction of water withdrawal from the Nooksack River. If Alcoa is not in operation, the average 2,244 to 2,316 gpm of process water required by the cogeneration facility would be supplied directly by the PUD. The maximum instantaneous use at the cogeneration facility could exceed 2,801 gpm. In either case under average conditions, there would be no net increase in water withdrawal from the Nooksack River.

3.3.4 Secondary and Cumulative Impacts

- On Page 3.3-25, the first sentence of the fifth paragraph should be deleted and replaced with the following text.

Other known or proposed projects in the Terrell Creek watershed include the Georgia Strait Crossing (GSX) pipeline, the BP ISOM unit, and the Brown Road Materials Storage Area. The GSX pipeline traverses about 5 miles of the Terrell Creek watershed. While some wetlands would be excavated, they would be reestablished after construction to restore their hydrologic character. The pump station would be on a 5-acre site, but none of that would be wetland. The ISOM unit would be constructed on existing impervious surface at the refinery where stormwater treatment and detention are already provided. The Brown Road Materials Storage Area would eliminate about 11 acres of wetlands that provide surface water storage but would include 34 acres of wetland mitigation to replace that function. Cumulatively, there would be some incremental loss of wetland surface water storage in the watershed, but it would be offset by onsite treatment and detention and offsite mitigation in the basin.

3.3.5 Mitigation Measures

- As a measure to avoid the potential drainage impact on Wetland C, the Corps of Engineers will not permit the Applicant to install a perimeter ditch along the west side of Wetland C. Because this would become a condition of the 404 permit, the following changes have been made. On Page 3.3-27 of the Draft EIS, the heading "Additional Recommended Mitigation Measures" and text under the heading should be deleted. A new heading "Wetland C" should be added in its place with the following new text under it.

To avoid the potential for draining Wetland C, the Applicant will not construct the perimeter ditch along the west side of the wetland.

3.3.6 Significant Unavoidable Adverse Impacts

- Because of the avoidance measure to reduce the potential drainage impact on Wetland C, the last sentence on Page 3.3-28 of the Draft EIS should be deleted.

Insert Figure 3.3-4

Insert Figure 3.3-8